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Attorney for Defendant
MATTCO FORGE, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CALIFORNIA COMMUNITIES
AGAINST TOXICS, a non-profit
public benefit association,

Plaintiff,

vs.

MATTCO FORGE, INC., a
California corporation,

Defendants.

Case No.: 2:17-cv-03793-TJH-ASx

**JOINT NOTICE OF LODGING OF
[PROPOSED] CONSENT DECREE
AND REQUEST FOR ENTRY
(Federal Water Pollution Control Act,
33 U.S.C. §§ 1251 to 1387)**

Judge: Hon. Terry J. Hatter

TO THE HONORABLE COURT:

On or about February 15, 2018, Plaintiffs CALIFORNIA COMMUNITIES
AGAINST TOXICS (“Plaintiffs”) and Defendants MATTCO FORGE, INC.
 (“Defendants”) (collectively the “Parties”) jointly notified the Court of the

1 settlement of this federal Clean Water Act matter. See ECF Doc. No. 20. The
2 Parties further advised the Court that, as required by the Clean Water Act and its
3 implementing regulations, Plaintiff had submitted the [Proposed] Consent Decree to
4 the Administrator of the United States Environmental Protection Agency (“EPA”),
5 the Regional Administrator of the EPA and the United States Attorney General
6 Citizen Suit Coordinator (collectively “the Agencies”) for the Agencies’ required
7 45-day review under 33 U.S.C. § 1365(c) and 40 C.F.R. § 135.5.

8 The Court has set April 16, 2018 at 10:00 a.m. for a hearing on an Order to
9 Show Cause re: Entry of the [Proposed] Consent Decree. See ECF Doc. No. 21.

10 On April 2, 2018, the Agencies notified the Court and the Parties that they
11 had reviewed the [Proposed] Consent Decree and that they did not object to entry of
12 the [Proposed] Consent Decree. See ECF Doc. No. 22.

13 The [Proposed] Consent Decree is lodged hereto as Exhibit A for the Court’s
14 consideration and requested entry on page 22. Among other things, the [Proposed]
15 Consent Decree requires stormwater best management practices at Defendant’s
16 facility that is the subject of this case, designed to meet applicable water quality
17 standards for stormwater run-off. The [Proposed] Consent Decree includes a
18 request that the Court retain jurisdiction to enforce the terms of the [Proposed]
19 Consent Decree if necessary.

20
21 The Parties respectfully request that the Court enter the [Proposed] Consent
22 Decree.

1 DATED: April 3, 2018

CASTELLÓN & FUNDERBURK LLP

2 By: /s/ per L.R. 5-4.3.4

3 WILLIAM W. FUNDERBURK
4 ATTORNEY FOR DEFENDANTS
5 MATTCO FORGE, INC.

6
7 DATED: April 3, 2018

ANACAPA LAW GROUP, INC.

8 By: /s/ *Jesse C. Swanhuysen*

9 JESSE C. SWANHUYSER
10 ATTORNEY FOR PLAINTIFFS
11 CALIFORNIA COMMUNITIES AGAINST
12 TOXICS.

13 Pursuant to Local Rule 5-4.3.4, the filer of this document attests that all of the
14 signatories listed, and on whose behalf the filing is submitted, concur in the
15 filing's content and have authorized the filing.
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